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September 6, 2023

Via ECF

U.S. Magistrate Judge Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Trooper 1 v. Cuomo, No. 22 Civ. 893 (LDH) (TAM)

Dear Judge Merkl:

On behalf of non-party Kaitlin, we write with Defendant Cuomo's consent to request the following briefing schedule for our opposition to Defendant Cuomo's motion to compel, *see* Dkt. 140, and our forthcoming cross-motion for a protective order and to quash or modify Defendant Cuomo's subpoenas, as follows:

- Kaitlin's combined memorandum of law in opposition to Defendant Cuomo's motion to compel and in support of Kaitlin's cross-motion for a protective order and to quash or modify the subpoenas: **September 21, 2023**.
- Defendant Cuomo's combined reply memorandum of law in further support of Defendant Cuomo's motion to compel and in opposition to Kaitlin's cross-motion for a protective order and to quash or modify the subpoenas: **September 28, 2023**.
- Kaitlin's reply memorandum of law in further support of Kaitlin's cross-motion for a protective order and to quash or modify the subpoenas: **October 5, 2023**.

Respectfully submitted,

_____/s/_____
Zoe Salzman
Nick Bourland